

Federal Communications Commission
Washington, D.C.

DOCKET FILE COPY ORIGINAL

March 22, 2000

Christopher Maxwell
Virginia Center for The Public Press
Radio Free Richmond Project
1621 W. Broad St.
Richmond, Va. 233220

Re: Acceptance of Motion As Timely Filed in (Docket No. 99-325)

The Office of the Secretary has received your request for acceptance of your pleading in the above-referenced proceeding as timely filed due to operational problems with the Electronic Comment Filing System (ECFS). Pursuant to 47 C.F.R. Section 0.231(I), the Secretary has reviewed your request and verified your assertions. After considering arguments, the Secretary has determined that this pleading will be accepted as timely filed.

However, Motions for Extensions of Time for the Reply Comment period are within the discretion of the bureau. We have forwarded your request in this regard to the

bureau for their consideration. If we can be of further assistance, please contact our office.

FEDERAL COMMUNICATIONS COMMISSION

for *William F. Carter*
Magalie Roman Salas
Secretary

Before the
FEDERAL COMMUNICATIONS
COMMISSION
Washington, DC 20554

In the Matter of Digital Audio
Broadcasting Systems and Their
Impact On the Terrestrial Radio

MM Docket No. 99-325
Broadcast Service.



From: Christopher Maxwell
Secretary/Treasurer
Virginia Center for
The Public Press
Radio Free
Richmond Project
1621 W Broad St.
Richmond Va. 23220
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REPLY-COMMENTS REGARDING DOCKET 99-325

**Please Accept this motion as Accepted for Timely Filing
Due to failure of the ECFS systems during February 2000.**

Dear FCC Commissioners and staff,

Please pardon the "rough draft" nature of these comments. They are indeed notes that were waiting for full functionality of the ECFS file search system to allow us full access to all the comments provided regarding Docket 99-325.

Thus we did not have access to many of the most important documents and comments in this proceeding.

And so we will be hoping to provide additional comments that might significantly modify this comment-reply when we have full access to all comments.

REPLY COMMENTS TO THE SMALL BUSINESS ADMINISTRATION COMMENTS:

The gist of the Small Business Administration comments are that the IBOC systems need more real-world tests.

We concur.

In our original comments on 99-325, we suggested "2nd Adjacent Grandfathered IBOC test festivals" to be held all over the United States.

These festivals would involve BOTH short spaced stations running the fullest proposed version of IBOC (the 430kHz versions).

The times of the tests should be widely publicized for the citizens in that area, by all media, not just those two stations.

The public should then be invited to come and test their own radios in the areas surrounding the antennas, and in between the antennas of the two stations.

And finally the public can check out sample IBOC DAB receivers to try them out under different circumstances to see if we do indeed think that IBOC is actually worth the trouble of transition.

In fact, this comment-reply period should be extended for that test as it makes its rounds around the US.

Sincerely,
Chris Maxwell

Christopher Maxwell of the Virginia Center for the Public Press

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